

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

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<b>DISPLAY TECHNOLOGIES, LLC,</b>  Plaintiff,  v.  <b>ALPINE ELECTRONICS OF AMERICA, INC.,</b>  Defendant	Case No.  Hon.  <b>Jury Trial Demanded</b>
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**Complaint for Patent Infringement**

Plaintiff Display Technologies, LLC (“Plaintiff” or “Display”) files this Complaint against Alpine Electronics of America, Inc. (“Defendant” or “Alpine”) for infringement of United States Patent No. 9,300,723 (the “‘723 Patent”).

**Parties and Jurisdiction**

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.
2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.
3. Plaintiff is a Texas limited liability company with a place of business at 1801 NE 123rd Street, Suite 314, North Miami, FL 33161.

4. On information and belief, Defendant is a California corporation with a principal office address of 1500 Atlantic Blvd., Auburn Hills, MI 48326. On information and belief, Defendant may be served through its registered agent, URS Agents Inc. (C3355755).

5. This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

### **Venue**

7. On information and belief, venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District. Alternatively, acts of infringement are occurring in this District and the Defendant has a regular and established place of business in this District.

### **Count I** **(Infringement of United States Patent No. 9,300,723)**

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10. Plaintiff is the owner by assignment of the ‘723 Patent with sole rights to enforce the ‘723 Patent and sue infringers.

11. A copy of the ‘723 Patent, titled “Enabling social interactive wireless communications,” is attached hereto as Exhibit A.

12. The ‘723 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Defendant has infringed and continues to infringe one or more claims, including at least Claim 12 of the ‘723 Patent by making, using, and/or selling media systems covered by one or more claims of the ‘723 Patent. For example, Defendant makes, uses, and/or sells the CDE-175BT systems, portable Bluetooth enabled speaker system, and any similar products (“Product”). Defendant has infringed and continues to infringe the ‘723 Patent in violation of 35 U.S.C. § 271.

14. Regarding Claim 12, the Product is configured to receive a media file (e.g., music file) from a wireless mobile device (e.g., mobile phone) over a communication network (e.g. Bluetooth network). The wireless mobile device (e.g., mobile phone) sends data (e.g., music file) to the media system. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Source: <https://www.alpine-usa.com/product/cde-175bt>

### Pairing and connecting with a BLUETOOTH device

When connecting a BLUETOOTH device for the first time, mutual registration (called "pairing") is required. Pairing enables this unit and other devices to recognize each other. This unit can connect two BLUETOOTH devices (two cellular phones, or a cellular phone and an audio device).



Source: [http://support.alpine-usa.com/products/documents/OM\\_CDE-175BT.pdf](http://support.alpine-usa.com/products/documents/OM_CDE-175BT.pdf)

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PRESS PLAY AND LET ALPINE DO  
THE REST

With advanced Bluetooth® wireless technology, audio streaming, and FLAC support, the CDE-175BT CD receiver delivers quality phone calls and playback of various music files so you stay in touch and in tune.

Source: <https://www.alpine-usa.com/product/cde-175bt>

## PRODUCT OVERVIEW

Whether your music is on CDs, streamed from your phone or digital player with your Pandora account, or even stored on a USB drive, the CDE-175BT can deliver the music you crave while on the road.

Source: <https://www.alpine-usa.com/product/cde-175bt>

15. The Product includes a wireless receiver (e.g., Bluetooth receiver).

Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.



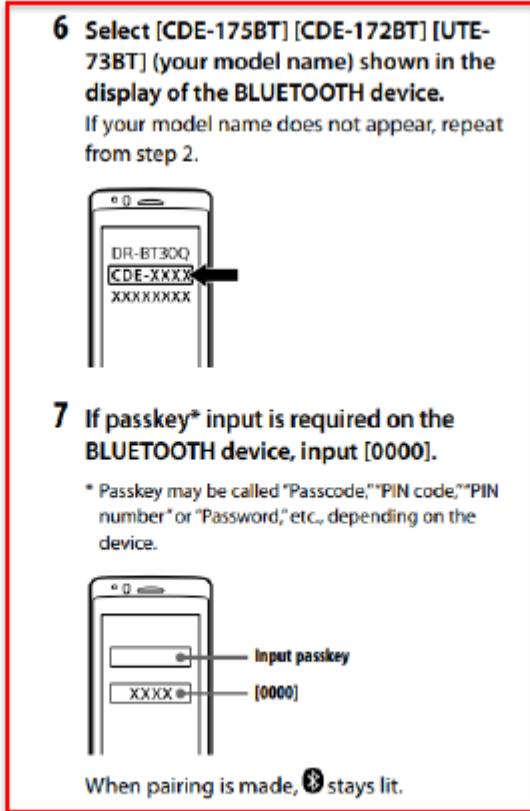
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16. The Product includes a security measure. For example, the Product must paired and connected by inputting a password (i.e., a security measure) to a wireless mobile device (e.g. mobile phone) before receiving a media file. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



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17. The Product is disposed in an accessible relation to at least one interactive computer network (e.g., Bluetooth network) that has a wireless range structured to permit authorized access (e.g., via pairing code) to said at least one interactive computer network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

**Wireless Communication (CDE-175BT/ CDE-**

**172BT/ UTE-73BT only)**

Communication System:

BLUETOOTH Standard version 3.0

Output:

BLUETOOTH Standard Power Class 2

(Conducted MAX +1 dBm)

Maximum communication range:

Line of sight approx. 10 m (33 ft)\*1

Frequency band:

2.4 GHz band

(2.4000 GHz – 2.4835 GHz)

Modulation method: FHSS

Compatible BLUETOOTH Profiles\*2:

A2DP (Advanced Audio Distribution Profile)

1.3

AVRCP (Audio Video Remote Control Profile)

1.3

HFP (Handsfree Profile) 1.6

PBAP (Phone Book Access Profile)

SPP (Serial Port Profile)

Corresponding codec:

SBC (.sbc), AAC (.m4a)

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18. When the wireless mobile device is within the wireless range, the wireless mobile device is detectable by the media system (e.g., the media system automatically detects a smartphone when the mobile device is within Bluetooth range). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

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19. At least one digital media file (e.g., music file) is initially disposed on the wireless mobile device (e.g., the mobile phone includes one or more music files). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

**AUDIO STREAMING HAS NEVER BEEN EASIER**

Do you have a large music library on your Bluetooth-enabled smartphone? The CDE-175BT can stream and control your smartphone's music via Bluetooth wireless technology. Want to listen to music from your iPhone without plugging-in? Stream your music via the Bluetooth connection. Whether you have music on your iPhone locally, on iTunes Match, or select third-party audio apps, the CDE-175BT can stream your tunes. If you have an Android smartphone, the CDE-175BT is compatible with Android AOA (Android Open Accessory) 2.0. Use the USB connection to access AOA for better sound and control over basic Bluetooth® audio streaming. These functions are delivered through the faceplate keys.

Source: <https://www.alpine-usa.com/product/cde-175bt>

20. The media system is structured to detect the wireless mobile device disposed within the wireless range (e.g., media system automatically detects the mobile phone when it is within Bluetooth range). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

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21. A communication link (e.g., Bluetooth) is structured to dispose the media system and the wireless mobile device (e.g. mobile phone) in a communicative relation with one another via the at least one interactive computer network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

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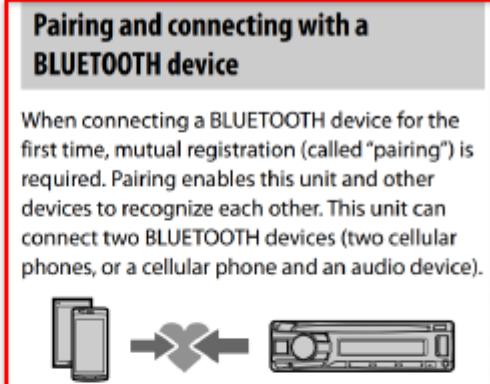
22. The communication link is initiated by the media system. The devices will automatically connect when the units are in range. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

## AUDIO STREAMING HAS NEVER BEEN EASIER

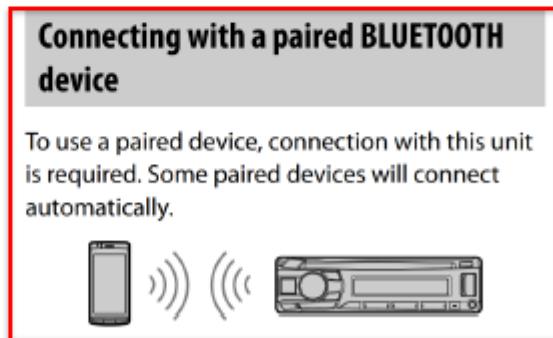
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23. The wireless mobile device and the media system are structured to transmit the at least one digital media file there between via the communication link (e.g., media system allows for the transmission of files between itself and the wireless mobile device; e.g., the mobile device transmits the music file to the media system). Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

24. The communication link is structured to bypass the security measure of the media system for a limited permissible use of the communication link by the wireless mobile device for only transferring the at least one digital media file to,

and displaying the at least one digital media file on, the media system (e.g., the media system bypasses the security measure of the Bluetooth network). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

## **NEAR-FIELD COMMUNICATION**

If your phone is equipped with Near-Field Communication (NFC) protocol, you can use it to quickly pair to the CDE-175BT. Just place your phone near the CDE-175BT to pair with it, then enjoy the Bluetooth phone and audio features through the head unit.

Source: <https://www.alpine-usa.com/product/cde-175bt>

### Connecting with a Smartphone by One touch (NFC) (CDE-175BT only)

By touching the control dial on the unit with an NFC\* compatible smartphone, the unit is paired and connected with the smartphone automatically.

\* NFC (Near Field Communication) is a technology enabling short-range wireless communication between various devices, such as mobile phones and IC tags. Thanks to the NFC function, data communication can be achieved easily just by touching the relevant symbol or designated location on NFC compatible devices.

For a smartphone with Android OS 4.0 or lower installed, downloading the app "NFC Easy Connect" available at Google Play™ is required. The app may not be downloadable in some countries/regions.

- 1 Activate the NFC function on the smartphone.  
For details, refer to the operating instructions supplied with the smartphone.
- 2 Touch the N-Mark part of the unit with the N-Mark part of the smartphone.



Source: [http://support.alpine-usa.com/products/documents/OM\\_CDE-175BT.pdf](http://support.alpine-usa.com/products/documents/OM_CDE-175BT.pdf)



Source: <https://www.alpine-usa.com/product/cde-175bt>

25. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

26. Defendant's actions complained of herein are causing irreparable

harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

27. Plaintiff is in compliance with 35 U.S.C. § 287.

**Jury Demand**

Plaintiff demands a trial by jury on all issues so triable.

**Prayer for Relief**

WHEREFORE, Plaintiff asks the Court to:

- (a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;
- (b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 9,300,723 (or, in the alternative, awarding Plaintiff running royalties from the time of judgment going forward);
- (c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;
- (d) Award Plaintiff pre-judgment and post-judgment interest and costs; and
- (e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: February 14, 2020

Respectfully submitted by:

/s/ Maxwell Goss

Maxwell Goss

Michigan Bar No. P78594

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**ATTORNEYS FOR PLAINTIFF**